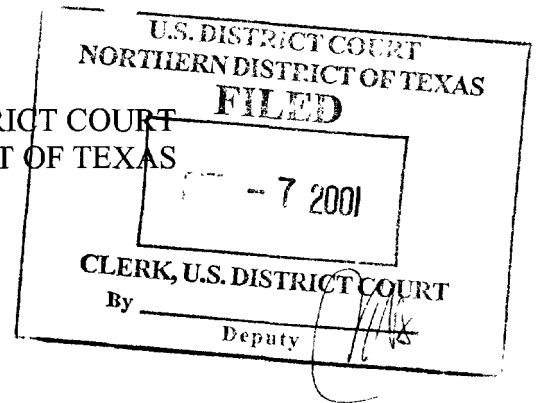


IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION



ST. PAUL FIRE & MARINE  
INSURANCE COMPANY,

Plaintiff,

VS.

KNAPP MEDICAL CENTER,

Defendants.

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CIVIL ACTION NO.3-00-CV2273-X

**AGREED STIPULATION FOR EXTENSION OF TIME  
TO FILE RESPONSE**

TO THE HONORABLE COURT:

Plaintiff St. Paul Fire & Marine Insurance Company ("St. Paul") files this Agreed Stipulation for Extension of Time to File Response Defendant's Motion to Dismiss and respectfully shows the Court as follows:

I.

1. Defendant Knapp Medical Center ("Knapp") served its Motion to Dismiss via certified mail, return receipt on December 14, 2000.

2. Pursuant to the Federal Rules of Civil Procedure and Local Rules, Plaintiff St. Paul's response is due on or before January 8, 2001.

3. Plaintiff St. Paul respectfully requests an extension of time to respond to Defendant Knapp's Motion to Dismiss.

II.

4. Defendant's Counsel has agreed to the granting of this extension wherein Plaintiff's response would be due on or before **March 8, 2001**.

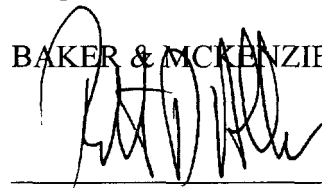
5. This request for extension is not made for the purposes of delay, but as a reasonable accommodation to Plaintiff so that justice may be done.

III.

WHEREFORE, PREMISES CONSIDERED, Plaintiff, St. Paul request an extension of time from this Court until March 8, 2001 to file its response to Defendant Knapp's Motion to Dismiss. A proposed Order granting the same is attached.

Respectfully submitted,

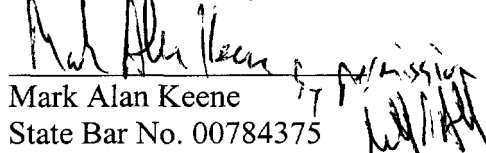
BAKER & MCKENZIE



Robert D. Allen  
State Bar No. 01051315  
Linda M. Dedman  
State Bar No. 24007098  
2001 Ross Avenue, Suite 2300  
Dallas, TX 75201  
Telephone: 214-978-3000  
Facsimile: 214-978-3099

AGREED:

DAVIS & DAVIS, P.C.



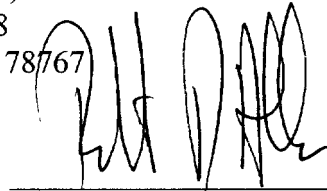
Mark Alan Keene  
State Bar No. 00784375  
P.O. Box 1588  
Austin, Texas 78767  
Telephone: 512-343-6248  
Facsimile: 512-343-0121

*ATTORNEYS FOR DEFENDANT*

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that a true and correct copy of the foregoing document has been served via certified mail, return receipt requested on the following counsel of record this 7<sup>th</sup> day of February, 2001:

Mark Alan Keene  
Davis & Davis, P.C.  
P.O. Box 1588  
Austin, Texas 78767

A handwritten signature in black ink, appearing to read 'R. D. Allen', is written over a horizontal line.

Robert D. Allen